

July 27, 2000

SENT VIA E-MAIL AND U.S. MAIL

Robert Aurigema, Esq.
AT&T Communications, Inc.
32 Avenue of the Americas, Room 2700
New York, NY 10013

-and-

Jeffrey F. Jones, Esq.
Laurie S. Gill, Esq.
Kenneth W. Salinger, Esq.
Jay E. Gruber, Esq.
Kevin R. Prendergast
Palmer & Dodge, LLP
One Beacon Street
Boston, MA 02108-3190

Re: D.T.E. 99-271

Dear Ms. Gill and Messrs. Aurigema, Jones, Salinger, Gruber and Prendergast:

Enclosed please find questions to AT&T Communications of New England, Inc. ("AT&T") issued by the Department based upon AT&T's July 18, 2000, filing in D.T.E. 99-271. Please submit AT&T's responses to the Department and the participants in hard copy and by e-mail on or before **5:00 p.m. Thursday, August 3, 2000**. Should you have any questions please contact either Cathy Carpino at (617)305-3622 or Tina Chin at (617)305-3578.

Sincerely,

Cathy Carpino
Hearing Officer

Tina Chin
Hearing Officer

Enc.

cc: DTE 99-271 Service List (w/enc.)

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**QUESTIONS TO AT&T COMMUNICATIONS OF NEW ENGLAND, INC.
D.T.E. 99-271**

The Department of Telecommunications and Energy ("Department") submits to AT&T Communications of New England, Inc. ("AT&T") the following Questions.

Instructions

The following instructions apply to this set of Questions and all subsequent Questions issued by the Department to AT&T in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if AT&T or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If AT&T finds that any one of these questions is ambiguous, please notify the hearing officers so that the question may be clarified prior to the preparation of a written

response.

7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; two (2) copies for each hearing officer; and one (1) copy to each member of the participants' service list, including the Department's telecom analysts.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

DEPARTMENT QUESTIONS TO
AT&T COMMUNICATIONS OF NEW ENGLAND, INC.
D.T.E. 99-271

1. [Checklist item # 1] Please provide the supporting documentation for AT&T's trunking requests to BA-MA with respect to the South Boston facility mentioned on page 41 of AT&T's supplemental comments. Specifically, please provide a copy of the forecast(s) provided to BA-MA, the ASRs, and documents indicating whether AT&T or BA-MA requested new due dates. According to AT&T's response to record request 234, AT&T does not track supplements, dates when FOCs are received back from BA-MA, nor CNR designations. However, if AT&T does have any of this information for the South Boston facility, please provide it.
2. [Checklist item # 1] According to AT&T, in March 2000, BA-MA "arbitrarily changed its due dates" 18 times for seven separate orders because BA-MA was not ready to test trunks (AT&T Supplemental Comments at 43). Please provide the supporting documentation for this assertion. In addition, please provide the underlying documentation supporting AT&T's claim that BA-MA missed trunking dates for 25 percent and 32 percent of AT&T's total trunking orders for April and May, 2000, respectively (id.).
3. [Checklist item # 1] Please provide documentation supporting AT&T's claim that the 'vast majority' of changes or supplementals are due to missed due dates by BA-MA (AT&T Supplemental Comments at 44). In addition, please provide the documentation demonstrating that AT&T was ready to accept every trunk order outlined in AT&T's initial and supplemental comments on the initial due date, and that AT&T actively pursued BA-MA to complete each order or issue the FOC (id.).
4. [Checklist item # 2] See AT&T Supplemental Comments at pp. 16, 19-23: Provide the Department with the documented results of AT&T's production testing in Massachusetts. In these results, show support for AT&T's claims that:
 - a) "AT&T has encountered continuing problems . . . with notices either never being received or being received late" (p. 19)
 - b) "As AT&T sent higher volumes of orders in June, . . . BA's OSS performance with respect to timely notices deteriorated" (p. 20)
 - c) "AT&T did not receive an acknowledgment from BA-MA for more than 5% of the orders sent during the high volume week of production testing" (p. 20)
 - d) "only 66% of the orders that should have received a Confirmation actually received them within 24 hours during the highest volume week of testing" (p. 21)

- e) "Only 54% of the provisioning completion notices received by AT&T. . . were on time" and "only 91% of all AT&T orders. . . that were eligible to be completed actually ever received either a provisioning or billing completion notice at all" (p. 22)
- f) "Many of AT&T's test orders were improperly rejected by the TISOC" and "over 50 percent of these were due to errors of TISOC personnel" (p. 23)
5. [Checklist item # 2] Please refer to page 18 of the AT&T Supplemental Comments. Provide documentation supporting the claim that "AT&T continually experiences time-outs when trying to access BA's pre-order system." Include in this supporting documentation evidence that Bell Atlantic has responded to reported troubles by "re-boot[ing] or 'bounc[ing]' their servers."
 6. [Checklist item # 2] Please refer to pages 23-24 of the AT&T Supplemental Comments. Provide evidence to support AT&T's claim that "instead of confirming the cancelled order, BA has issued a completion notice against the cancelled order in almost every case."
 7. [Checklist item # 2] Please refer to page 24 of the AT&T Supplemental Comments. Provide supporting evidence for AT&T's claims that Loss of Line reports are inaccurate. Include in this support specific examples of the problems cited by AT&T in its comments.
 8. [Checklist item # 2] Please refer to page 25 of the AT&T Supplemental Comments. AT&T discusses a late change to the business rules which was not announced until a "day after it was put into the production release." Please provide complete documentation concerning this change and its effect on AT&T's operations, including copies of all correspondence between AT&T and BA-MA.
 9. [Checklist item # 2] Please refer to page 26 of the AT&T Supplemental Comments. Provide supporting evidence for the claim that "CLEC Type 5 requests are typically scheduled as tentative for an upcoming release and then mysteriously fall of the list for that release when the specifications are provided."
 10. [Checklist item # 2] Please refer to page 27 of the AT&T Supplemental Comments. Provide documentation showing that BA-MA has canceled AT&T orders and asked AT&T to re-submit orders in order to meet its three-day interval for closing trouble tickets on missing notifiers.
 11. [Checklist item # 2] Please refer to pages 28-29 of the AT&T Supplemental Comments. Provide evidence supporting AT&T's claims that BA-MA has "significant billing issues in Massachusetts." Specifically, show support for the claims that:
 - a) Massachusetts production testing resulted in inaccurate DUF records
 - b) "AT&T claims go unanswered and require constant follow-up on the part of AT&T

to ensure they are resolved.”

Also, please provide evidence of any of the stated New York billing problems if they have been found to occur in Massachusetts as well.

12. [Checklist item # 2] Please refer to page 29 of the AT&T Supplemental Comments. Please provide the Massachusetts-specific documentation supporting AT&T’s assertion that BA-MA has lost call records for AT&T customers or indicate where in the record this information has been provided.
13. [Checklist item # 4] See p. 34 of AT&T’s Supplemental Comments: Please answer the following questions regarding the 232 LSRCs AT&T received from BA-MA in May 2000 that contained incorrect information.
 - (a) Provide the total number of hot cut orders AT&T submitted to BA-MA in May 2000.
 - (b) Did all 232 LSRCs involve hot cuts?
 - (c) Provide the PON numbers for the 232 orders and specify what was the incorrect information (i.e., wrong due date, wrong pairs, missing a cable and pair assignment).
 - (d) Indicate for each of the 232 orders whether AT&T performed a “work-around.”